

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

MOOG, INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN  
PILKINGTON, MISOOK KIM, and DOES NOS.  
1-50.

Defendants.

Civil Action No. 1:22-cv-00187-  
LJV-JJM

**DECLARATION OF RYAN  
BANKS IN SUPPORT OF  
DEFENDANT SKYRYSE, INC.'S  
OPPOSITION TO PLAINTIFF'S  
MOTION TO COMPEL  
WRITTEN DISCOVERY  
RESPONSES AND  
PRODUCTION OF  
DOCUMENTS**

I, Ryan Banks, under penalty of perjury and pursuant to 28 U.S.C. § 1746,  
declares as follows:

1. I am an attorney with Latham & Watkins LLP, counsel to Defendant Skyryse, Inc. ("Skyryse"). I am familiar with this matter and the facts set forth herein.
2. I submit this Declaration in support of Skyryse's Opposition to Plaintiff's Motion to Compel Written Discovery Responses and Production of Documents.
3. Attached hereto as Exhibit A is a true and correct copy of the hearing transcript of proceedings before Magistrate Judge Jeremiah J. McCarthy, dated June 16, 2022.
4. Attached hereto as Exhibit B is a true and correct copy of correspondence between counsel for Skyryse and counsel for Moog, dated June 24, 2022.
5. Attached hereto as Exhibit C is a true and correct copy of a proposed source code protocol counsel for Skyryse proposed to counsel for Moog.
6. Attached hereto as Exhibit D is a true and correct copy of the Northern District

of California's Model Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets, which can be accessed at <https://www.cand.uscourts.gov/forms/model-protective-orders/>. Last accessed July 11, 2022.

7. Attached hereto as Exhibit E is a true and correct copy of the Eastern District of California's Sample Protective Order for Patent Cases, which can be accessed at <https://www.txed.uscourts.gov/?q=judge/chief-district-judge-rodney-gilstrap>. Last accessed July 11, 2022.

8. Attached hereto as Exhibit F is a true and correct copy of email correspondence between counsel for Moog and counsel for Skyrise, dated July 7, 2022.

9. Attached hereto as Exhibit G is a true and correct copy of an email sent by counsel for Moog to the Magistrate Judge Jeremiah J. McCarthy, dated June 29, 2022.

Dated: July 11, 2022



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Ryan Banks